

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	CASE NO. 16 CR 163
v.)	
)	Honorable Mary M. Rowland
MARCOS MENDEZ)	

AFFIDAVIT OF MARCOS MENDEZ

I, Marcos Mendez, am over the age of 18 and if called to testify would competently testify as follows:

1. I was detained at Reclusorio Norte prison in Mexico City from on or about July 3, 2019 to on or about January 21, 2020.

2. The conditions at Reclusorio Norte were extraordinarily difficult to endure.

3. At Reclusorio Norte, inmates are required to pay “taxes” to the guards and organized gangs that control the prison. In addition to a daily tax to the guards and the gangs, inmates must pay separate taxes for basic necessities such as a cell, a toilet and shower, and a bed, on top of a twenty percent tax on the money that is sent to them from the outside.

4. Inmates who do not pay are subjected to violence.

5. During the first two or three weeks of my detention at Reclusorio Norte, I was attacked and beaten on two occasions by guards and another three occasions by gang members, because I did not make the requisite payments.

6. I was initially confined with between twenty and forty other inmates in a cell that could reasonably fit six people. The cell did not have a toilet or beds. I had to try to sleep standing up, because there was not enough room on the floor. Rats and cockroaches were prevalent.

7. After I was beaten several times, and it was clear I had no other choice, I began paying the “taxes” required of me.

8. I was subsequently transferred to a 4-man cell that was used by ten people, including myself. I did not have a bed and had to sleep on the floor with the rats and cockroaches.

9. The cell did not have a toilet, but I was allowed to use a community toilet outside the cell.

10. I lived in these conditions for the remainder of my time at Reclusorio Norte.

11. In November and December 2019, I was attacked and beaten again for not making the payments required of me.

12. I was regularly in fear of my life throughout my time at Reclusorio Norte.

13. After arriving at MCC Chicago, I lived under COVID-19 restrictions that required me to remain in my cell for 23 ½ hours per day on weekdays and 24 hours per day on weekends from approximately March through September 2020. From approximately October 2020 through February 2021, these restrictions required me to remain in my cell for 22 hours per day on weekdays and 24 hours per day on weekends.

14. Since arriving at MCC Chicago, I have also been repeatedly threatened by other inmates based on the nature of the charges against me. I remain in fear of being attacked by other inmates.

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: ~~10~~ 11-9-22

Signature: 
Marcos Mendez